

Falsified Quality Control Inspection Records

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Introduction

Subject: Falsified Quality Control Inspection
Records

Contractors: Washington Group International
and RTS Wright Industries, LLC

DOE Office: Idaho Operations Office

ID Coordinator: Steve Somers

OE Personnel: Sharon Hurley

Background

CONTRACTOR RESPONSIBILITIES

- † BNFL is Prime Contractor on Advanced Mixed Waste Treatment Project (AMWTP)
- † BNFL subcontracted with WGI for the design, procurement and construction of the AMWTP
- † WGI issued purchase order to RTS to fabricate the AMWTP Supercompactor Glovebox Suite

Background (cont'd)

- DOE received allegations from a concerned individual in Feb. 2002 of
 - Inspection record falsification
 - Misuse of QC stamps
- BNFL/WGI and RTS investigations found
 - Records falsification by RTS
 - Procedure violations related to QC stamps and MRB tags

Discussion of Breakdowns (RTS)

- † RTS generated falsified quality inspection documentation to resolve an undocumented WGI audit finding
- † RTS failed to comply with internal procedural requirements related to QA Stamp control and nonconformance tags
- † RTS management assessments and quality improvement activities were not effective in identifying problems

Discussion of Breakdowns (WGI)

- † WGI failed to adequately implement requirements to approve RTS inspection and test procedures
- † WGI oversight and assessments of RTS were ineffective

Key Factors in Enforcement Decision (RTS)

Duration and Identification of Deficiencies

- † Occurred over many months
- † Known by RTS supervisory personnel and the Director of Quality Assurance
- † Identified to DOE by concerned individual

Key Factors in Enforcement Decision (RTS)

Significance

Falsification of lifetime quality records is of high significance

Positive RTS Behavior

- † Acceptance of responsibility for breakdowns
- † Aggressive investigation of concerns
- † Comprehensive corrective actions

Key Factors in Enforcement Decision (WGI)

Duration and Identification of Deficiencies

- † Occurred over many months and went undetected by WGI assessments
- † Identified to DOE by a concerned individual

Significance

Moderate – Contributed to falsification of QC records

DOE Concerns

WGI reluctant to take any QA responsibilities for its contract with DTC

Enforcement Outcome (RTS)

PNOV issued October 2003 citing three violations:

† One 820.11 violation at SL II

- CP \$27,500
- 50% mitigation

† One Work Processes violation at SL II

- CP \$13,750 (25% mitigation for self-identification)
- 50% mitigation for CA's)

† One Quality Improvement violation at SL III, no

Enforcement Outcome (WGI)

- PNOV issued October 2003, citing one violation pertaining to work performance and procurement deficiencies
- SL II, CP \$55,000
- No mitigation for self-identification or corrective actions

Enforcement Outcome (BNFL)

- † OE investigation determined BNFL was not responsible for noncompliance
- † BNFL performed comprehensive investigation